

**U.S. Department of Justice***United States Attorney  
Eastern District of New York*GK/KCB/DEL/SMF  
F. #2028R01401*271 Cadman Plaza East  
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September 16, 2024

By ECF & E-mail

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Re: United States v. Cherwitz et al.  
Criminal Docket No. 23-146 (DG)

Dear Counsel:

The government hereby provides notice pursuant to Fed. R. Crim. P. 16(a)(1)(G) and Fed. R. Evid. 702, 703 and 705 that, at trial, it anticipates calling Dr. Chitra Raghavan, a licensed clinical psychologist, to testify regarding methods of “coercive control” within various organizations. The government hereby provides additional materials related to the expected testimony of Dr. Raghavan in the enclosed disclosure, which is appended to this letter. The government reserves the right to supplement this disclosure with additional information.

